DAW

Indiana Department of Environmental Management

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Joseph E. Kernan Governor

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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Heckett MultiServ, a contractor of ISG-Indiana Harbor Inc. West End Slag Dump 3001 Dickey Road East Chicago, Indiana 46312

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for new and existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T089-7066-00341				
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: Expiration Date:			



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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3 and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary slag and kish processing plant.

Responsible Official: Keith T. McCarthy

Source Address: West End Slag Dump, 3001 Dickey Road, East Chicago,

Indiana 46312

Mailing Address: P.O. Box 351, Whiting, Indiana 46394

General Source Phone Number: (219) 399-3506

SIC Code: 3295 County Location: Lake

Source Location Status: Nonattainment for SO₂, and ozone

Attainment for all other criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD and Emission Offset Rules;

Major Source, Section 112 of the Clean Air Act

1 of 28 Source Categories under PSD and Emission Offset

Rules

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

ISG Indiana Harbor, Inc. is a fully integrated steelmaking and finishing facility consists of a source with on-site contractors:

- (a) ISG Indiana Harbor, Inc., (089-00318) the primary operation, is located at, 3001 Dickey Road, East Chicago, Indiana 46312; and
- (b) Heckett MultiServ, (089-00341) the on-site contract operation (a slag and kish processing plant), is located at West End Slag Dump, 3001 Dickey Road, East Chicago, Indiana.

IDEM has determined that ISG Indiana Harbor, Inc. and Heckett MultiServ are under the common control of ISG Indiana Harbor, Inc. These two plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both ISG Indiana Harbor, Inc. and Heckett MultiServ as one source.

Separate Part 70 permits will be issued to ISG Indiana Harbor, Inc. and Heckett MultiServ solely for administrative purposes. For permitting purposes, ISG Indiana Harbor, Inc. is assigned Permit No. 089-7099-00318 and Heckett MultiServ is assigned Permit No. 089-7066-00341.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

Heckett MultiServ, consists of the following permitted emission units and pollution control devices:

- (a) Main Slag Processing Plant with a maximum throughput rate of 500 tons per hour of slag, controlled by water suppression installed in 1993:
 - (1) One (1) Boliden Allis 6' X 10' Feeder

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(2) One (1) Boliden Allis 7' X 10' Grizzly

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- (3) One (1) Boliden Allis 6' X 11' Feeder
- (4) One (1) 42" X 129' Main Feed Belt conveyor
- (5) One (1) Boliden 6' X 8" Feeder
- (6) One (1) Stearns 60" X 84" Magnet Drum
- (7) Three (3) Boliden Allis 4' X 12' Feeders
- (8) One (1) Boliden Allis 6' X 20' Double Deck Screen
- (9) One (1) 36" X 60' Metallics Product Conveyor
- (10) One (1) 36" X 16' Metallics Transfer Conveyor
- (11) One (1) 36" X 100' Metallics Feed Conveyor
- (12) Two (2) Stearns 42 X 60 Magnet Drums
- (13) Three (3) conveyors, each with a maximum throughput rate of 500 tons of slag per hour
- (14) Two (2) screens, each with a maximum throughput rate of 500 tons of slag per hour
- (15) Two (2) 24" X 60' Metallics Product Conveyors
- (16) One (1) 36" X 95' Metallics Feed Conveyor
- (17) One (1) 24" X 35' Slag Transfer Conveyor
- (18) One (1) 24" X 60' Slag Recirculating Conveyor
- (19) One (1) 42" x 137' Slag Feed Conveyor
- (20) One (1) Boliden Allis 8' X 20' Double Deck Screen
- (21) One (1) 36"X 75' Slag Conveyor
- (22) One (1) 24" X 60' Slag Transfer Conveyor
- (23) One (1) 24" X 80' Slag Product Conveyor
- (24) One (1) 36" X 80' Slag Feed Conveyor
- (25) One (1) PEP 6' X 18' Vari-Vibe III Single Deck Screen
- (26) Two (2) 24" X 80' Slag Product Conveyors
- (27) One (1) 36" X 84' Slag Conveyor
- (28) One (1) Pendulum Magnet

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- East Chicago, Indiana Permit Reviewer: Teresa Freeman
 - (29) One (1) 36' X 34' 6 Reversing Conveyor
 - (30) One (1) 54" Eljay Crusher
 - (31) One (1) 24" X 44' Crusher Recirculating Conveyor
 - (32) Aggregate Storage Piles with total capacity of 2,000,000 tons
 - **(b) CM-13 Processing Plant** with a maximum throughput capacity of 300 tons per hour of slag or kish controlled by water suppression installed in 1993:
 - (1) One (1) 48' X 60' Feeder
 - (2) Two (2) AC 4' X 12' Feeders
 - (3) One (1) Dings 36" X 60" Magnet Drum
 - (4) One (1) PEP Screen
 - (5) One (1) Tyler 6' X 20' Double Deck Screen
 - (6) One (1) 36" X 75' Conveyor
 - (7) Two (2) 24" X 30' Conveyors
 - (8) One (1) 36" X 85' Conveyor
 - (9) One (1) 24" X 100' Conveyor
 - (10) One (1) 36 " X 20' Conveyor
 - (11) Three (3) 36" X 60' Conveyors
 - (12) One (1) 42" X 18' Conveyor
 - (13) One (1) slag crushing circuit having a maximum capacity of 250 tons of slag per hour consisting of one (1) crusher identified as ID-26 and six (6) conveyor transfers identified as ID-22, ID-23, ID-24, ID-25, ID-27 and ID-28, respectively, installed in 2000.
 - (14) Aggregate Storage Piles with total capacity of 1,000,000 tons
 - **(c) Kish Processing Plant**, with a maximum throughput rate of 350 tons of kish per hour, controlled by water suppression, consisting of the following, installed in 2003:
 - (1) Two (2) raw material feeders, with a maximum combined throughput rate of 350 tons of kish per hour.
 - (2) Three (3) conveyors, each with a maximum throughput rate of 350 tons of kish per hour
 - (3) One (1) Drum Magnet
 - (4) One (1) double screen, with a maximum throughput rate of 200 tons of kish iron per

hour.

- (5) Five (5) conveyors, each with a maximum throughput rate of 200 tons of kish iron per hour
- (6) Aggregate Storage Piles with total capacity of 1,000,000 tons
- A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

Heckett MultiServ, consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. [326 IAC 8-9]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

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SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

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(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;

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- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the Aresponsible official@as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action

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brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office (NWRO) of IDEM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

NWRO Telephone Number: 219-981-6712 NWRO Facsimile Number: 219-881-6745

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an

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emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the Aresponsible official@as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2)If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or (a) 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application shall be certified by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittees right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]

- (a) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:
 - (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
 - The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
 - (3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
 - (4) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
 - (5) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

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- (6) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (7) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (8) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (9) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (10) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (11) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.
- (12) PM10 emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity
- Fugitive particulate matter from the material processing facilities shall not exceed ten percent (10%) opacity
- (14) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
 - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6-1-11.1(d)(9).

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on November 22, 1993.

(b) The source is subject to 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures) because it is subject to the requirements of 326 IAC 6-1-11.1. Pursuant to this rule, the source shall comply with parts (h), (i), (k), (l), (m), (o), (p) and (q) of this rule.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4 and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
 The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are
 applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes
 or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet
 on all facility components.
- (f) Demolition and renovation

 The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ, of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
 - (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.
 - (b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.
 - (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirements.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:

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- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within Anormal@ parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the Aresponsible official as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
 - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

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- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if

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received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the Aresponsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161

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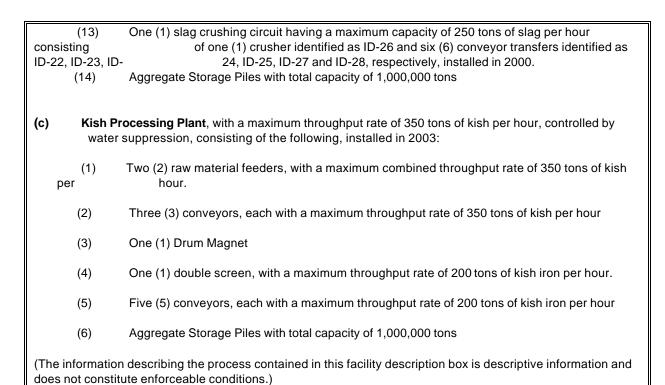
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SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Heckett MultiServ, consists of the following permitted emission units and pollution control devices installed in 1993:

- (a) Main Slag Processing Plant with a maximum throughput rate of 500 tons per hour of slag, controlled by water suppression installed in 1993:
 - (1) One (1) Boliden Allis 6' X 10' Feeder
 - (2) One (1) Boliden Allis 7' X 10' Grizzly
 - (3) One (1) Boliden Allis 6' X 11' Feeder
 - (4) One (1) 42" X 129' Main Feed Belt conveyor
 - (5) One (1) Boliden 6' X 8" Feeder
 - (6) One (1) Stearns 60" X 84" Magnet Drum
 - (7) Three (3) Boliden Allis 4' X 12' Feeders
 - (8) One (1) Boliden Allis 6' X 20' Double Deck Screen
 - (9) One (1) 36" X 60' Metallics Product Conveyor
 - (10) One (1) 36" X 16' Metallics Transfer Conveyor
 - (11) One (1) 36" X 100' Metallics Feed Conveyor
 - (12) Two (2) Stearns 42 X 60 Magnet Drums
 - (13) Three (3) conveyors, each with a maximum throughput rate of 500 tons of slag per hour
 - (14) Two (2) screens, each with a maximum throughput rate of 500 tons of slag per hour
 - (15) Two (2) 24" X 60' Metallics Product Conveyors
 - (16) One (1) 36" X 95' Metallics Feed Conveyor
 - (17) One (1) 24" X 35' Slag Transfer Conveyor
 - (18) One (1) 24" X 60' Slag Recirculating Conveyor
 - (19) One (1) 42" x 137' Slag Feed Conveyor
 - (20) One (1) Boliden Allis 8' X 20' Double Deck Screen
 - (21) One (1) 36"X 75' Slag Conveyor
 - (22) One (1) 24" X 60' Slag Transfer Conveyor
 - (23) One (1) 24" X 80' Slag Product Conveyor
 - (24) One (1) 36" X 80' Slag Feed Conveyor
 - (25) One (1) PEP 6' X 18' Vari-Vibe III Single Deck Screen
 - (26) Two (2) 24" X 80' Slag Product Conveyors
 - (27) One (1) 36" X 84' Slag Conveyor
 - (28) One (1) Pendulum Magnet
 - (29) One (1) 36' X 34' 6 Reversing Conveyor
 - (30) One (1) 54" Eljay Crusher
 - (31) One (1) 24" X 44' Crusher Recirculating Conveyor
 - (32) Aggregate Storage Piles with total capacity of 2,000,000 tons
- (b) CM-13 Processing Plant with a maximum throughput capacity of 300 tons per hour of slag or kish controlled by water suppression installed in 1993:
 - (1) One (1) 48' X 60' Feeder
 - (2) Two (2) AC 4' X 12' Feeders
 - (3) One (1) Dings 36" X 60" Magnet Drum
 - (4) One (1) PEP Screen
 - (5) One (1) Tyler 6' X 20' Double Deck Screen
 - (6) One (1) 36" X 75' Conveyor
 - (7) Two (2) 24" X 30' Conveyors
 - (8) One (1) 36" X 85' Conveyor
 - (9) One (1) 24" X 100' Conveyor
 - (10) One (1) 36 " X 20' Conveyor
 - (11) Three (3) 36" X 60' Conveyors
 - (12) One (1) 42" X 18' Conveyor



Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (a) and (g), the crushing, sizing, storing and transporting of mineral materials shall be limited as follows:

- (a) All operations where the process is totally enclosed, and thus it is practical to measure the particulate matter emissions therefrom, shall not exceed 0.03 grain per dry standard cubic feet per minute.
- (b) In addition, 326 IAC 2, 326 IAC 5-1, and 326 IAC 6-4 shall apply in all cases to mineral aggregate operations.

D.1.2 Prevention of Significant Deterioration and Emission Offset [326 IAC 2-2] [326 IAC 2-3]

- (a) Throughput of slag and kish shall be limited to 2,000,000 tons per twelve (12) consecutive month period at the Main Slag Processing Plant with compliance determined at the end of each month.
- (b) Throughput of slag and kish shall be limited to 1,000,000 tons per twelve (12) consecutive month period at the CM-13 Processing Plant with compliance determined at the end of each month.
- (c) Throughput of slag and kish shall be limited to 1,000,000 tons per twelve (12) consecutive month period at the Kish Processing Plant with compliance determined at the end of each month.
- (d) Liquid moisture shall constitute no less than 1.5% of the process stream by weight at the screening, crushing, separation, conveying and stockpile emission points.

Compliance with these limits will assure that the PM and PM10 emissions from the slag and kish

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processes shall remain less than 25 tpy and 15 tpy, respectively. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-2 (PSD), do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 PM and PM10 Control

In order to comply with Conditions D.1.1 and D.1.2, the Permittee shall use wet suppression to control emissions of PM and PM10 from the feeder, conveyors, and the screens as required to ensure the slag and kish has a moisture content greater than 1.5 percent. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with D.1.1 and D.1.2 limitations. If weather conditions preclude the use of wet suppression, the Permittee shall perform chemical analysis on the slag and kish to ensure it has a moisture content greater than 1.5 percent.

D.1.5 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), compliance with the opacity limits specified in Condition C.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP). If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAM may request that the FDCP be revised and submitted for approval.

Opacity from the activities shall be determined as follows:

- (a) Batch Transfer
 - The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.
- (b) Continuous Transfer
 The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.
- (c) Wind Erosion from Storage Piles

 The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. The limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.
- (d) Wind Erosion from Exposed AreasThe opacity shall be determined using 40 CFR 60, Appendix A, Method 9.
- (e) Material Transported by Truck or Rail

Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the inplant transportation requirement.

- (f) Material Transported by Front End Loader or Skip Hoist Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:
 - (1) The first will be taken at the time of emission generation.
 - (2) The second will be taken five (5) seconds later.
 - (3) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet from the plume approximately and at right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

(g) Material Processing Limitations
Compliance with all opacity limitations from material processing equipment shall be
determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible emissions
limitations from material processing equipment shall be determined using 40 CFR 60,
Appendix A, Method 22. Compliance with all particulate matter limitations from material
processing equipment shall be determined using 40 CFR 60, Appendix A, Method 5 or 17.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the exhausts from feeders, conveyor transfer points and screens shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

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D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records of monthly slag and kish throughput at each of the process plants.

(b) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements) and to document compliance with Condition D.1.5:

The source shall keep the following documentation to show compliance with each of its control measures and control practices:

- (1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.
- (2) For each application of water or chemical solution to roadways, the following shall be recorded:
 - (A) The name and location of the roadway controlled
 - (B) Application rate
 - (C) Time of each application
 - (D) Width of each application
 - (E) Identification of each method of application
 - (F) Total quantity of water or chemical used for each application
 - (G) For each application of chemical solution, the concentration and identity of the chemical
 - (H) The material data safety sheets for each chemical
- (3) For application of physical or chemical control agents not covered by 326 IAC 6-1-11.1(B), the following:
 - (A) The name of the agent
 - (B) Location of application
 - (C) Application rate
 - (D) Total quantity of agent used
 - (E) If diluted, percent of concentration
 - (F) The material data safety sheets for each chemical
- (4) A log recording incidents when control measures were not used and a statement of explanation.
- (5) Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department
- (c) To document compliance with Condition D.1.4, the Permittee shall maintain records of the

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chemical analysis of the slag material, as needed.

- (d) To document compliance with Condition D.1.6, the Permittee shall maintain records of once per shift visible emission notations of the feeders, conveyor transfer points and screens.
- (e) All records shall be maintained in accordance with Section C General Record Keeping Requirements of this permit.

D.1.8 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the Aresponsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), a quarterly report shall be submitted, stating the following:
 - (1) The dates any required control measures were not implemented
 - (2) A listing of those control measures
 - (3) The reasons that the control measures were not implemented
 - (4) Any corrective action taken

These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C B General Reporting Requirements of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Insignificant Activities

Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. [326 IAC 8-9]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-9]

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), the owner or operator of a stationary vessel with a capacity of less than thirty-nine thousand (39,000) gallons, and which is not exempt, shall maintain a record and submit to the department a report containing the following information on the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.
- (d) A description of the emission control equipment for each vessel described in 326 IAC 8-9-4 (a) and 4(b), applicable, or a schedule for installation of emission control equipment on vessels described in 326 IAC 8-9-4(a) and 4(b), if applicable, with a certification that the emission control equipment meets the applicable standards.

The owner or operator of a stationary vessel shall keep all records as described for the life of the vessel.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.2 Record Keeping Requirements

To document compliance with Condition D.2.1, the Permittee shall keep readily accessible records showing the dimension of the storage tanks and an analysis showing the capacity of the storage tanks.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Heckett MultiServ, a contractor of ISG-Indiana Harbor Inc.

Source Address: West End Slag Dump, 3001 Dickey Road, East Chicago, Indiana 46312

Mailing Address: P.O. Box 351, Whiting, Indiana 46394

Par	70 Permit No.:	T089-7066-00341
	This certifica	ation shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
	Please check what o	document is being certified:
9	Annual Compliance	Certification Letter
9	Test Result (specify)
9	Report (specify)	
9	Notification (specify)	
9	Affidavit (specify)	
9	Other (specify)	
	ertify that, based on in cument are true, accu	formation and belief formed after reasonable inquiry, the statements and information in the trate, and complete.
Si	gnature:	
Pr	inted Name:	
Tit	le/Position:	
Ph	ione:	
Da	ate:	

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

COMPLIANCE BRANCH 100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 Phone: 317-233-5674

Fax: 317-233-5967

PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Heckett MultiServ, a contractor of ISG-Indiana Harbor Inc.

Source Address: West End Slag Dump, 3001 Dickey Road, East Chicago, Indiana 46312

Mailing Address: P.O. Box 351, Whiting, Indiana 46394

Part 70 Permit No.: T089-7066-00341

This form consists of 2 pages

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9	This is an emergency as defined in 326 IAC 2-7-1(1	2)	,
•	This is an enlergency as defined in 320 IAC 2-7-1(1	~)	1

The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-

451-6027 or 317-233-5674, ask for Compliance Section); and

C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile

Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A
Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applied	cable, mark N/A	Page 2 of 2
Date/Time Emergency started:		
Date/Time Emergency was corre	cted:	
Was the facility being properly op Describe:	erated at the time of the emergency?	Y N
Type of Pollutants Emitted: TSP, I	PM-10, SO ₂ , VOC, NO _X , CO, Pb, other	:
Estimated amount of pollutant(s)	emitted during emergency:	
Describe the steps taken to mitig	ate the problem:	
Describe the corrective actions/r	esponse steps taken:	
Describe the measures taken to	minimize emissions:	
	e to equipment, substantial loss of ca	ilities are necessary to prevent imminent pital investment, or loss of product or raw
Form Completed	by:	
Title / Position:		
Date:		
Phone:		
	A certification is not required for this	report.

Heckett MultiServ East Chicago, Indiana Permit Reviewer: Teresa Freeman

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Heckett MultiServ, a contractor of ISG-Indiana Harbor Inc.		, Indiana 46312	
Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit: Month 9 9 9 Su Tit Sig Da	Quarter:	YEAR:	
Month	Tons	Tons	Tons
	This Month	Previous 11 Months	12 Month Total
-	Deviation/s occurred i	n this quarter.	_
Titl Sig Da	e / Position: nature:		

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Heckett MultiServ East Chicago, Indiana Permit Reviewer: Teresa Freeman

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit:	West End Slag Dump P.O. Box 351, Whiting T089-7066-00341 CM-13 processing p Throughput of slag a	lant	o, Indiana 46312
	Quarter:	YEAR:	
Month	Tons	Tons	Tons
Worth	This Month	Previous 11 Months	12 Month Total
9	No deviation occurre	d in this quarter.	
9	Deviation/s occurred Deviation has been r	in this quarter. eported on:	_
Tit Siy Da	tle / Position:		

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Heckett MultiServ East Chicago, Indiana Permit Reviewer: Teresa Freeman

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit:	West End Slag Dump P.O. Box 351, Whiting T089-7066-00341 Kish processing plan Throughput of slag a	t	, Indiana 46312
	Quarter:	YEAR:	
Month	Tons	Tons	Tons
on	This Month	Previous 11 Months	12 Month Total
9	No deviation occurred Deviation has been re	·	
Title	/ Position: ature: ::		

Heckett MultiServ East Chicago, Indiana Permit Reviewer: Teresa Freeman

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Heckett MultiServ, a contractor of ISG-Indiana Harbor Inc. Source Address: West End Slag Dump, 3001 Dickey Road, East Chicago, Indiana 46312 Mailing Address: P.O. Box 351, Whiting, Indiana 46394 Part 70 Permit No.: T089-7066-00341 Months: _____ to _____ Year: _____ Page 1 of 2 This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period'. 9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. 9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD **Permit Requirement** (specify permit condition #) Date of Deviation: **Duration of Deviation: Number of Deviations: Probable Cause of Deviation: Response Steps Taken: Permit Requirement** (specify permit condition #) **Duration of Deviation:** Date of Deviation: **Number of Deviations: Probable Cause of Deviation:** Response Steps Taken:

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Permit Requirement (specify permit condition #)								
Date of Deviation:	Duration of Deviation:							
Number of Deviations:								
Probable Cause of Deviation:								
Response Steps Taken:								
Permit Requirement (specify permit condition #)								
Date of Deviation:	Duration of Deviation:							
Number of Deviations:								
Probable Cause of Deviation:								
Response Steps Taken:								
Permit Requirement (specify permit condition #)								
Date of Deviation:	Duration of Deviation:							
Number of Deviations:								
Probable Cause of Deviation:								
Response Steps Taken:								
Form Completed By:								
Title/Position:								
Date:								
Phone:								

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Heckett MultiServ, a contractor of ISG Indiana Harbor Inc.

Source Location: West End Slag Dump, 3001 Dickey Road, East Chicago, Indiana 46312

County: Lake SIC Code: 3295

Operation Permit No.: T089-7066-00341
Permit Reviewer: Teresa Freeman

On November 20, 2003, the Office of Air Quality (OAQ) had a notice published in The Post Tribune in Merrillville, Indiana and The Times in Munster, Indiana, stating that Heckett MultiServ had applied for a Part 70 Operating Permit to operate a steel slag processing facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of sixty (60) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes. Miscellaneous grammar and spelling corrections have been made throughout the permit also.

Change 1:

On December 31, 2003, IDEM adopted a revision to 326 IAC 1-4-1 redesignating Lake County as attainment for PM10. Therefore, condition A.1 is revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary slag and kish processing plant.

Responsible Official: Keith T. McCarthy

Source Address: West End Slag Dump, 3001 Dickey Road, East Chicago,

Indiana 46312

Mailing Address: P.O. Box 351, Whiting, Indiana 46394

General Source Phone Number: (219)399-3506

SIC Code: 3295 County Location: Lake

Source Location Status: Nonattainment for PM₁₀*, SO₂, and ozone

Attainment for all other criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD and Emission Offset Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories under PSD and Emission

Offset Rules

*Lake County has been federally redesignated in 40 CFR 81.315 as attainment for PM10. The Air Pollution Control Board will be making the same redesignation in state rules.

The title of condition B.22, Inspection and Entry, has been revised to include an additional rule cite as follows:

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Change 3:

IDEM has revised the condition C.7 in order to clarify what parts of the regulation are not federally enforceable as follows:

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of **326 IAC 1-7-1(3)**, 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

Change 4:

In condition C.9, the term "source" is replaced with "Permittee" as follows:

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Change 5:

In condition C.15, the term "source" is replaced with "Permittee" as follows:

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source **Permittee** must comply with the applicable requirements of 40 CFR 68. Change 6:

Condition C.16 - Compliance Response Plan - Preparation, Implementation, Records, and Reports has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements. In addition if a source is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP. The changes to condition C.16 are as follows:

- C.16 Compliance Response Plan Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
 - (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and

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implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, the Permittee shall promptly notify the IDEM, OAQ shall be promptly notified of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.

Change 7:

IDEM has revised condition C.18, since the rule revisions to 326 IAC 2-6 are not effective, the provisions that will be required by the revised rule will not be incorporated at this time. The condition will be revised so that the Permittee is required to follow the requirements of the rule, including the revised rule when it becomes effective, instead of requiring in the condition that the emission statement to be submitted on April 15th (or July 1st). Once the rule becomes effective, the Permittee may request an amendment to the operating permit in order to incorporate specific requirements of the revised rule.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. , that must be received by April 15 of each year and This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. . The submittal should cover the period identified in 326 IAC 2-6. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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- (eb) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

Change 8:

In condition C.20, the term "source" is replaced with "Permittee" as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Change 9:

Condition D.1.3 has been changed to state a Preventative Maintenance Plan is required for all emission units and control devices.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the crushing, for the screening and for the conveying operations these facilities and their control devices.

Change 10:

In condition D.1.6 the word exhaust is removed for clarity.

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the exhausts from feeders, conveyor transfer points and screens exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Change 11:

On the Quarterly Reports a zero (0) was left off the limit and has been added as follows:

Quarterly Report on Page 37, added zero (0) to limit.

Parameter: Throughput of slag and kish combined

Limit: 2,000,00**0** tons per twelve (12) consecutive month period

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Quarterly Report on Page 38, added zero (0) to limit

Parameter: Throughput of slag and kish combined

Limit: 1,000,000 tons per twelve (12) consecutive month period

Quarterly Report on Page 39, added zero (0) to limit

Parameter: Throughput of slag and kish combined

Limit: 1,000,00**0** tons per twelve (12) consecutive month period

On January 16,2004, Heckett MultiServ submitted comments on the proposed Part 70 permit. The comments and IDEM responses (with language added shown in bold and language in strikeout) are as follows:

Comment 1:

In Section A, provision A.3 (c), Kish Processing Plant - the equipment description should include a drum magnet and one additional feeder.

Response 1:

OAQ agrees and has made the following change to A.3(c) and D.1 description box:

- **(c) Kish Processing Plant**, with a maximum throughput rate of 350 tons of kish per hour, controlled by water suppression, consisting of the following, installed in 2003:
 - (1) One (1) Two (2) raw material feeders, with a maximum combined throughput rate of 350 tons of kish per hour.
 - (2) Three (3) conveyors, each with a maximum throughput rate of 350 tons of kish per hour
 - (3) One (1) Drum Magnet
 - One (1) double screen, with a maximum throughput rate of 200 tons of kish iron per hour.
 - (45) Five (5) conveyors, each with a maximum throughput rate of 200 tons of kish iron per hour
 - (56) Aggregate Storage Piles with total capacity of 1,000,000 tons

Comment 2:

Section D.1.5 Particulate Matter (PM) states, "Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), compliance with the opacity limits specified in Condition C.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP)." The remainder of condition D.1.5 - (a) through (h) - reiterates the limits of C.5; while D.1.5 (g), Material Processing Limitations, lists the compliance determination test methods.

The Record Keeping and Reporting Requirements of Condition D.1.7 specify the means to document compliance for (a), Condition D.1.2; (c), Condition D.1.4; and (d), Condition D.1.6. - but not for D.1.5. While you stated in a January 16, 2004 conversation with Mr. Wentz that D.1.5 (g) is

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not meant to require regular or routine testing via Method 9, Heckett is concerned that the ambiguity of D.1.5 (g) could be construed to require such Method 9 testing.

To resolve this, D.1.7 (c) should be revised to explicitly state, " (b) To document compliance with Condition D.1.5, Lake County Fugitive Particulate Matter Control Requirements (326 IAC 6-1-11.1), the source shall keep the following documentation to show compliance with each control measures and control practices of the source's Fugitive Dust Control Plan:

This change would serve only to clarify Heckett's compliance obligation and would not trigger any additional or alternative requirements.

Response 2:

IDEM OAQ agrees that a clarification is needed in D.1.7(b), not (c) as stated in the Company's comment. Condition D.1.7(b) has been revised as follows:

(b) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements) and **to document compliance with Condition D.1.5**:

The source shall keep the following documentation to show compliance with each of its control measures and control practices:

- (1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.
- (2) For each application of water or chemical solution to roadways, the following shall be recorded:
 - (A) The name and location of the roadway controlled
 - (B) Application rate
 - (C) Time of each application
 - (D) Width of each application
 - (E) Identification of each method of application
 - (F) Total quantity of water or chemical used for each application
 - (G) For each application of chemical solution, the concentration and identity of the chemical
 - (H) The material data safety sheets for each chemical
- (3) For application of physical or chemical control agents not covered by 326 IAC 6-1-11.1(B), the following:
 - (A) The name of the agent
 - (B) Location of application

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- (C) Application rate
- (D) Total quantity of agent used
- (E) If diluted, percent of concentration
- (F) The material data safety sheets for each chemical
- (4) A log recording incidents when control measures were not used and a statement of explanation.
- (5) Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department

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Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Heckett Multiserv, a contractor of ISG Indiana Harbor Inc.

Source Location: West End Slag Dump, 3001 Dickey Road, East Chicago, Indiana 46312

County: Lake SIC Code: 3295

Operation Permit No.: T089-7066-00341
Permit Reviewer: Teresa Freeman

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Heckett Multiserv relating to the operation of a slag and kish processing plant.

Source Definition

ISG Indiana Harbor, Inc. is a fully integrated steelmaking and finishing facility consists of a source with on-site contractors:

- (a) ISG Indiana Harbor, Inc., (089-00318) the primary operation, is located at, 3001 Dickey Road, East Chicago, Indiana 46312; and
- (b) Heckett Multiserv, (089-00341) the on-site contract operation (a slag and kish processing plant), is located at West End Slag Dump, 3001 Dickey Road, East Chicago, Indiana.

IDEM has determined that ISG Indiana Harbor, Inc. and Heckett Multiserv are under the common control of ISG Indiana Harbor, Inc. These two plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both ISG Indiana Harbor, Inc. and Heckett Multiserv as one source.

Separate Part 70 permits will be issued to ISG Indiana Harbor, Inc. and Heckett Multiserv solely for administrative purposes. For permitting purposes, ISG Indiana Harbor, Inc. is assigned Permit No. 089-7099-00318 and Heckett Multiserv is assigned Permit No. 089-7066-00341.

Permitted Emission Units and Pollution Control Equipment

Heckett Multiserv, consists of the following permitted emission units and pollution control devices:

- (a) Main Slag Processing Plant with a maximum throughput rate of 500 tons per hour of slag, controlled by water suppression installed in 1993:
 - (1) One (1) Boliden Allis 6' X 10' Feeder
 - (2) One (1) Boliden Allis 7' X 10' Grizzly
 - (3) One (1) Boliden Allis 6' X 11' Feeder

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- (4) One (1) 42" X 129' Main Feed Belt conveyor
- (5) One (1) Boliden 6' X 8" Feeder
- (6) One (1) Stearns 60" X 84" Magnet Drum
- (7) Three (3) Boliden Allis 4' X 12' Feeders
- (8) One (1) Boliden Allis 6' X 20' Double Deck Screen
- (9) One (1) 36" X 60' Metallics Product Conveyor
- (10) One (1) 36" X 16' Metallics Transfer Conveyor
- (11) One (1) 36" X 100' Metallics Feed Conveyor
- (12) Two (2) Stearns 42 X 60 Magnet Drums
- (13) Two (2) 24" X 60' Metallics Product Conveyors
- (14) One (1) 36" X 95' Metallics Feed Conveyor
- (15) One (1) 24" X 35' Slag Transfer Conveyor
- (16) One (1) 24" X 60' Slag Recirculating Conveyor
- (17) One (1) 42" x 137' Slag Feed Conveyor
- (18) One (1) Boliden Allis 8' X 20' Double Deck Screen
- (19) One (1) 36"X 75' Slag Conveyor
- (20) One (1) 24" X 60' Slag Transfer Conveyor
- (21) One (1) 24" X 80' Slag Product Conveyor
- (22) One (1) 36" X 80' Slag Feed Conveyor
- (23) One (1) PEP 6' X 18' Vari-Vibe III Single Deck Screen
- (24) Two (2) 24" X 80' Slag Product Conveyors
- (25) One (1) 36" X 84' Slag Conveyor
- (26) One (1) Pendulum Magnet
- (27) One (1) 36' X 34' 6 Reversing Conveyor
- (28) One (1) 54" Eljay Crusher
- (29) One (1) 24" X 44' Crusher Recirculating Conveyor
- **CM-13 Processing Plant** with a maximum throughput capacity of 300 tons per hour of slag or kish controlled by water suppression installed in 1993:

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- (1) One (1) 48' X 60' Feeder
- (2) Two (2) AC 4' X 12' Feeders
- (3) One (1) Dings 36" X 60" Magnet Drum
- (4) One (1) PEP Screen
- (5) One (1) Tyler 6' X 20' Double Deck Screen
- (6) One (1) 36" X 75' Conveyor
- (7) Two (2) 24" X 30' Conveyors
- (8) One (1) 36" X 85' Conveyor
- (9) One (1) 24" X 100' Conveyor
- (10) One (1) 36 " X 20' Conveyor
- (11) Three (3) 36" X 60' Conveyors
- (12) One (1) 42" X 18' Conveyor
- (13) One (1) slag crushing circuit having a maximum capacity of 250 tons of slag per hour consisting of one (1) crusher identified as ID-26 and six (6) conveyor transfers identified as ID-22, ID-23, ID-24, ID-25, ID-27 and ID-28, respectively, installed in 2000.
- **(c) Kish Processing Plant**, with a maximum throughput rate of 350 tons of kish per hour, controlled by water suppression, consisting of the following, installed in 2003:
- (1) One (1) raw material feeder, with a maximum throughput rate of 350 tons of kish per hour.
- (2) One (1) double screen, with a maximum throughput rate of 200 tons of kish iron per hour.
- (3) Five (5) conveyors, each with a maximum throughput rate of 200 tons of kish iron per hour

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at Heckett Multiserv, during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application (supplemented on September 29, 2003, includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16) and 326 IAC 2-7-10.5:

(a) Main Slag Processing Plant

- (1) Three (3) conveyors, each with a maximum throughput rate of 500 tons of slag per hour
- (2) Two (2) screens, each with a maximum throughput rate of 500 tons of slag per hour
- (3) Aggregate Storage Piles with total capacity of 2,000,000 tons

(b) CM-13 Processing Plant

(1) Aggregate Storage Piles with total capacity of 1,000,000 tons

(c) Kish Processing Plant

- (1) Three (3) conveyors, each with a maximum throughput rate of 350 tons of kish per hour
- (2) Aggregate Storage Piles with total capacity of 1,000,000 tons

Insignificant Activities

Heckett Multiserv, consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) A gasoline fuel transfer and dispensing operation handling less than or equal to 1300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallon capacity.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month.
- (c) The following VOC and HAP storage containers:
 - (1) storage tanks less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons
 - (2) vessels storing lubricating oils, hydraulic oils, machining oil and machining fluids
- (d) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

Existing Approvals

Heckett Multiserv, has been operating under previous approvals including, but not limited to, the following:

- (1) Plant originally permitted by East Chicago local agency.
- (2) CP 089-2371 issued on April 14, 1993
- (3) Minor Source Modification 089-12067-00341 issued on May 25, 2000.
- (4) Significant Source Modification 089-16532-00341 issued on April 22, 2003.

No conditions from previous approvals were incorporated into this Part 70 permit

Reason not incorporated: On September 29, 2003, Heckett Multiserv requested a modification to their facility. Originally, the facility was permitted by the East Chicago local agency. Since 1993, there have been three modifications to this source, each with limits for PM and PM10 derived in different ways, but not for all processes. Therefore, in this permit, IDEM is proposing to limit throughput to each process to maintain minor status for 326 IAC 2-2 and 2-3 and not incorporate conditions from past permits. Heckett Multiserv proposed to add new equipment to two of the processes, increase stockpile capacity, remove the Mill Scale facility and increase throughput to the plant processes. Because the slag and kish processed by Heckett Multiserve is moist by nature, IDEM agreed to accept the controlled emission factors found in AP-42 1/95, Table 11.19.2-2 to calculate the allowable emissions from the facility. The moisture content ranges for these emission factors is 0.55% to 2.88%. Heckett Multiserve agreed to accept to maintain a moisture content greater than 1.5%. This condition as well as limiting the throughputs to each of the processes shall insure that PM emissions shall be less than 25 tpy and PM10 emissions shall be less than 15 tpy.

Enforcement Issue

Heckett Multiserv has the following enforcement actions pending:

- (1) An enforcement referral was received in the office of enforcement on April 22, 2003 regarding the following violations:
 - (a) On March 12, 2003, during a compliance inspection it was discovered that a temporary registration had been issued in October 1996 for 30 days for an experimental operation. This operation continued to operate without a permit until March 12, 2003. (326 IAC 2-1-1(b)(3)(c))

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on October 31, 1996.

A notice of completeness letter was mailed to the source on July 2, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1-5.

Potential To Emit -ISG Indiana Harbor, Inc. and Heckett Multiserv

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as Athe maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.@

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant Potential To Emit (tons/year)

PM greater than 100

PM-10 greater than 100

SO₂ greater than 100

VOC greater than 25

CO

 NO_x

Total HAPs

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

greater than 100

greater than 100

greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, SO_2 , CO and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Actual Emissions-Heckett Multisery

The following table shows the actual emissions from Heckett Multiserv. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	2.51
PM-10	1.19
SO ₂	no data
VOC	no data
СО	no data
NO _x	no data
HAP	no data

County Attainment Status

The source is located in Lake County.

Pollutant	Status			
PM-10	Moderate nonattainment*			
SO ₂	Marginal Nonattainment			
NO ₂	Attainment			
Ozone	Severe Nonattainment			
СО	Attainment			
Lead	Attainment or unclassifiable			

*Lake County has been federally redesignated in 40 CFR 81.315 as attainment for PM10. The Air Pollution Control Board will be making the same redesignation in state rules.

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- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been classified as nonattainment for PM10 (see table above) and SO2. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Lake County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) Heckett Multiserv, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.670 through 60.676, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants) since the slag material being crushed is not a nonmetallic mineral pursuant to 40 CFR 60.671.
- (b) Heckett Multiserv, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.380 through 60.686, Subpart LL (Standards of Performance for Metallic Mineral Processing Plants) since the operations are not producing metallic mineral concentrates from ore. None of these slag crushing and/or screening operations is performed in a mine or pit.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 40 CFR Part 61 and 40 CFR Part 63) applicable to from Heckett Multiserv.
- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to Heckett Multiserv because the source is not a major source of HAPs and Heckett Multiserv does not includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

State Rule Applicability

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Heckett Multiserv East Chicago, Indiana Permit Reviewer: Teresa Freeman

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is in 1 of the 28 source categories defined in 326 IAC 2-2-1(p)(1) and has the potential to emit of PM greater than 100 tons/yr. Therefore, the existing source is a PSD major source.

326 IAC 2-3 (Emission Offset)

This existing source is located in Lake County (nonattainment area for Ozone, PM10 and SO₂) and has potential to emit PM10 greater than 100 tons/yr. Therefore, the existing source is a Emission Offset major source.

326 IAC 2-2 and 326 IAC 2-3 (PSD and Emission Offset)

- (a) Throughput of slag and kish shall be limited to 2,000, 000 tons per twelve (12) consecutive month period at the Main Slag Processing Plant
- (b) Throughput of slag and kish shall be limited to 1,000, 000 tons per twelve (12) consecutive month period at the CM-13 Processing Plant
- (c) Throughput of slag and kish shall be limited to 1,000, 000 tons per twelve (12) consecutive month period at the Kish Processing Plant
- (d) Liquid moisture shall constitute not less than 1.5% of the process stream by weight at the screening, crushing, separation, conveying and stockpile emission points.

Compliance with these limits will assure that the PM and PM10 emissions from the slag and kish processes shall remain less than 25 tpy and 15 tpy, respectively. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-2 (PSD), do not apply.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The potential to emit HAPs from the proposed modification is less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year (Lake County) of PM10. Pursuant to this rule, the owner/ operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to 326 IAC 6-1-2 (a) and (g), the screening, crushing, separation, conveying and transporting of mineral materials shall be limited to the following:

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(1) All operations where the process is totally enclosed, and thus it is practical to measure the emissions therefrom, shall comply with the 0.03 grain per dry standard cubic feet per minute in 326 IAC 6-1-2 (a).

(2) In addition, 326 IAC 2, 326 IAC 5-1, and 326 IAC 6-4 shall apply in all cases to mineral aggregate operations.

326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements)

There are no specific emissions limitations established in 326 IAC 6-1-10.1 for the facilities in this permit. Therefore, the requirements of 326 IAC 6-1-10.1 do not apply to these facilities.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

- (a) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:
 - (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
 - (2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
 - (3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
 - (4) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
 - (5) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
 - (6) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
 - (7) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
 - (8) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
 - (9) The PM10 emissions from building vents shall not exceed twenty-two-thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (10) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
 - (11) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.
 - (12) PM10 emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity
 - (13) Fugitive particulate matter from the material processing facilities shall not exceed

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ten percent (10%) opacity

(14) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:

- (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
- (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6-1-11.1(d)(9).

Material processing facilities include crushers, screens, grinders, mixers, dryers, belt conveyors, bucket elevators, bagging operations, storage bins, and truck or railroad car loading stations.

(b) The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on November 22, 1993.

326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures)

The source is subject to 326 IAC 6-1-11.2 because it is subject to the requirements of 326 IAC 6-1-11.1 and 326 IAC 6-1-10.1(d). Pursuant to this rule, the source shall comply with parts (h), (i), (k), (l), (m), (o), (p) and (q) of this rule.

326 IAC 6-3 (Particulate Emissions Limitations for Process Operations)

The source is not subject to the requirements of 326 IAC 6-3 because the plant is subject to the requirements of 326 IAC 6-1 (Nonattainment Particulate Emission Limitations). Pursuant to the applicability requirements (326 IAC 6-3-1(b)), if any limitation established by this rule is inconsistent with applicable limitations contained in 326 IAC 6-1 (Nonattainment Particulate Emission Limitations) or 326 IAC 12 (New Source Performance Standards), then the limitations contained in 326 IAC 6-1 or 326 IAC 12 prevail.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Insignificant Activities

326 8-4-3 (Petroleum Liquid Storage Facilities)

The storage tanks have capacities less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable to these tanks.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is located in Lake County, therefore, the volatile organic liquid storage vessels of this modification are subject to 326 IAC 8-9. Since these storage tanks have the capacities less than 39,000 gallons, these tanks are subject to the reporting and record keeping provisions of 326 IAC 8-9-6(a) and (b), which have the following requirements:

- (a) The owner or operator of each vessel shall maintain records for the life of the vessel for the following information:
 - The vessel identification number.

- (2) The vessel dimensions.
- (3) The vessel capacity.
- (4) A description of the emission control equipment for each vessel described in 326 IAC 8-9-4 (a) and 4 (b), applicable, or a schedule for installation of emission control equipment on vessels described in 326 IAC 8-9-4(a) and 4 (b), if applicable, with a certification that the emission control equipment meets the applicable standards.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a sources failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source is as follows:

1. Heckett Multiserv, has applicable compliance monitoring conditions as specified below:

Visible emission notations of the exhausts from feeders, conveyor transfer points and screens exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

These monitoring conditions are necessary because the feeder, the conveyors, and the screens must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), and 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations).

Conclusion

The operation of this slag and kish processing plant shall be subject to the conditions of the

Heckett Multiserv East Chicago, Indiana Permit Reviewer: Teresa Freeman

attached proposed Part 70 Permit No. T089-7066-00341.

EMISSION INVENTORY CALCULATIONS
Heckett MultiServ Plant 7 LTV Steel-E. Chicago, IN PROCESS EMISSIONS-Main Slag Processing Plant 500

New Equipment

	4000											
	4000				ı					1		
	2,000,000		51.4	D1440 EE		PTE			D14.40	Controlled PTE		
- 15	DECODIDEION		PM	PM10 EF		PTE	Total	PM ,	PM-10	Total	PM	PM-10
ID 1	DESCRIPTION	ref	lbs/tn	lbs/tn	%	Feed %	Tons/Yr	tons/yr	tons/yr	Tons/Yr	tons/yr	tons/yr
1	Raw Feed	е	1.0E-04		100	100	4,380,000	0.221	0.105	2,000,000	0.101	0.048
2	Grizzly	е		4.80E-05	94	100	4,380,000	0.221	0.105	1,880,000	0.095	0.045
2a 3	Grizzly to +8 Oversize Stockpile	e e		4.80E-05 4.80E-05	6 94	100	4.380.000	0.000	0.000 0.105	120,000 1.880.000	0.006	0.003
4	Grizzly to feeder				94	100	, ,	0.221		, ,		
5	Feeder to Conv	e e		4.80E-05 4.80E-05	94	0	4,380,000	0.221	0.105 0.000	1,880,000 1,880,000	0.095 0.095	0.045 0.045
6	conv to screen screen	f		8.40E-04	79	0	-	0.000	0.000	1,580,000	1.394	0.664
7		e		4.80E-05	79	0	-	0.000	0.000	1,580,000	0.080	0.038
8	screen to conv	e		4.80E-05	79	0	-	0.000	0.000	1,580,000	0.080	0.038
9	conv to 5/8x8 or 4x8 stockpile	e		4.80E-05	79	0	-	0.000	0.000	1,580,000	0.080	0.038
10	screen to conv conv to conv			4.80E-05	35	0			0.000			0.038
	conv to 5/8x4 metallic stockpile	е		4.80E-05 4.80E-05	20	0	-	0.000	0.000	700,000 400,000	0.035	0.017
	screen to conv	e e		4.80E-05 4.80E-05	59	0	-	0.000	0.000	1,180,000	0.020	0.010
13				4.80E-05	59	0	-			1,180,000	0.059	0.028
14	conv to screen screen	e f		8.40E-05	59	0	-	0.000	0.000	1,180,000	1.041	0.028
15		_		4.80E-05	29	0	-	0.000	0.000	580,000	0.029	0.496
16	screen to conv conv to ??? stockpile	e e		4.80E-05	29	0	-	0.000	0.000	580,000	0.029	0.014
17	screen to conv	e		4.80E-05	29	0	-	0.000	0.000	580,000	0.029	0.014
18					29	0	-	0.000	0.000	580,000	0.029	0.014
19	conv to ??? stockpile	е		4.80E-05 4.80E-05	40	100	4.380.000	0.000	0.000	,	0.029	0.014
	conv to feeder	е					,,			800,000		
20 21	feeder to conv	е		4.80E-05	20	100	4,380,000	0.221	0.105	400,000	0.020	0.010
22	conv to screen	e f		4.80E-05	20 35	100	4,380,000	_	0.105	400,000	0.020	0.010 0.294
	screen			8.40E-04			4,380,000	3.863	1.840	700,000	0.617	
23 24	screen to conv	е		4.80E-05	35 35	0	-	0.000	0.000	700,000	0.035	0.017
25	conv to screen	e		4.80E-05	35	0	-	0.000	0.000	700,000	0.035 0.617	0.017
	screen	f		8.40E-04			-	0.000	0.000	700,000		0.294
26 27	screen to conv	е		4.80E-05	35 35	0	-	0.000	0.000	700,000	0.035	0.017
	conv to -#4 stockpile	e e		4.80E-05 4.80E-05	15	0	-	0.000	0.000	700,000 300,000	0.035 0.015	0.017
28	screen to conv	_		4.80E-05 4.80E-05	15	0			0.000	300,000	0.015	0.007
30	conv to #4x3/4 stockpile	e e		4.80E-05 4.80E-05	5	0	-	0.000	0.000	100,000	0.015	0.007
30	screen to conv conv to conv	e		4.80E-05 4.80E-05	5	0	-	0.000	0.000	100,000	0.005	0.002
32	conv to 3/4x11/2 stockpile	e		4.80E-05	5	0	-	0.000	0.000	100,000	0.005	0.002
32	screen to conv	e		4.80E-05 4.80E-05	5	100	4,380,000	0.000	0.000	100,000	0.005	0.002
33	conv to conv	e		4.80E-05	5	100	4,380,000	0.221	0.105	100,000	0.005	0.002
	magnet to 11/2x8 metalics stockpile	e		4.80E-05	5	0	4,300,000	0.221	0.000	100,000	0.005	0.002
36		_		4.80E-05	5	100	4 380 000	0.000	0.000	100,000	0.005	0.002
37	conv to conv	e e		4.80E-05	5	100	4,380,000 4,380,000	0.221	0.105	100,000	0.005	0.002
38	conv to crusher crusher	e d		4.80E-05 5.90E-04	5	100	4,380,000	2.713	1.292	100,000	0.005	0.002
38				4.80E-05	5	100	4,380,000	0.221	0.105	100,000	0.062	0.030
40	crusher to conv	e e		4.80E-05	5	100	4,380,000	0.221	0.105	100,000	0.005	0.002
		e	1.0⊑-04	4.00⊑-05	ິນ	100	4,300,000	9.446		100,000		
Emission T	(see drawing)							9.446	4.498		5.050	2.405

References (see drawing)

Emission factors listed in AP-42 Table 11.19.2-2 only list PM-10 factors.

- Note c of this Table states PM emissions can be estimated by multiplying PM-10 d. AP-42 1/95, Table 11.19.2-2, Tertiary Crushing (moisture content ranges from 0.55% to 2.88%). e. AP-42 1/95, Table 11.19.2-2, Conveyor Transfer Point (moisture content ranges from 0.55% to 2.88%).
- f. AP-42 1/95, Table 11.19.2-2, Screening (moisture content ranges from 0.55% to 2.88%). g. AP-42 p. 12.5-24 Iron and Steel Production (10/86 reformatted 1/95) pile formation stacker pellet lump ore

Heckett MultiServ Plant 7 LTV Steel-E. Chicago, IN

PROCESS EMISSIONS-Proposed CM-13 Processing Plant

proposed tph: 300 proposed hours 3333

proposed tons 1,000,000_							Uncontrolled	led PTE		Controlled PTE		
	Same as Current Equipment		PM	PM10 EF	FEED	PTE	total	PM-10	PM	total	PM	PM-10
ID	DESCRIPTION	ref	lbs/tn	lbs/tn	%	Feed %	Tons/Yr	tons/yr	tons/yr	Tons/Yr	tons/yr	tons/yr
1	Raw Feed	е	1.0E-04	4.80E-05	100	100	2,628,000	0.132	0.063	1000000	0.050	0.024
2	Feeder to main feed conv	е	1.0E-04	4.80E-05	100	100	2,628,000	0.132	0.063	1000000	0.050	0.024
3	Main conv to mag feeder	е	1.0E-04	4.80E-05	50	100	2,628,000	0.132	0.063	500000	0.025	0.012
4	Mag drum to conv	е	1.0E-04	4.80E-05	48	100	2,628,000	0.132	0.063	480000	0.024	0.012
5	Main conv to mag feeder	е	1.0E-04	4.80E-05	50	0	-	0.000	0.000	500000	0.025	0.012
6	Mag drum to conv	е	1.0E-04	4.80E-05	48	0	-	0.000	0.000	480000	0.024	0.012
7	mag drum to met conv	е	1.0E-04	4.80E-05	2	0	-	0.000	0.000	20000	0.001	0.000
8	Mag drum to met conv	е	1.0E-04	4.80E-05	2	0	-	0.000	0.000	20000	0.001	0.000
9	Met conv to met conv	е	1.0E-04	4.80E-05	4	0	-	0.000	0.000	40000	0.002	0.001
10	Met conv to 0x3/4 metallic stockpi	е	1.0E-04	4.80E-05	4	0	-	0.000	0.000	40000	0.002	0.001
11	Conv to slag feed conv	е	1.0E-04	4.80E-05	96	100	2,628,000	0.132	0.063	960000	0.048	0.023
12	Slag conv to Pep screen	е	1.0E-04	4.80E-05	96	100	2,628,000	0.132	0.063	960000	0.048	0.023
13	Pep screen	f	1.8E-03	8.40E-04	96	100	2,628,000	2.318	1.104	960000	0.847	0.403
13a	Pep screen to screen	е	1.0E-04	4.80E-05	66	0	-	0.000	0.000	660000	0.033	0.016
14	Screen	f	1.8E-03	8.40E-04	66	100	2,628,000	2.318	1.104	660000	0.582	0.277
15	Screens to underscreen conv	е	1.0E-04	4.80E-05	30	0	-	0.000	0.000	300000	0.015	0.007
16	Underscreen conv to -1/8 conv	е		4.80E-05	32	0	-	0.000	0.000	320000	0.016	0.008
17	Minus 1/8 conv to -1/8 slag stockp	е	1.0E-04		32	0	=	0.000	0.000	320000	0.016	0.008
18	Screen to conv	е	1.0E-04		33	100	2,628,000	0.132	0.063	330000	0.017	0.008
19	Conv to conv	е	1.0E-04		34	0	-	0.000	0.000	340000	0.017	0.008
20	Conv to 1/8x3/4 slag stockpile	е	1.0E-04	4.80E-05	35	0	-	0.000	0.000	350000	0.018	0.008
21	Screen to oversize conv	е	1.0E-04		10	100	2,628,000	0.132	0.063	100000	0.005	0.002
22	Conv to conv	е	1.0E-04		10	100	2,628,000	0.132	0.063	100000	0.005	0.002
23	Conv to hopper	е	1.0E-04	4.80E-05	10	100	2,628,000	0.132	0.063	100000	0.005	0.002
24	Hopper to conv	е	1.0E-04		10	100	2,628,000	0.132	0.063	100000	0.005	0.002
25	Conv to crusher	е	1.0E-04		10	100	2,628,000	0.132	0.063	100000	0.005	0.002
26	Crusher	d	1.2E-03		10	100	2,628,000	1.628	0.775	100000	0.062	0.030
27	Crusher to conv	е		4.80E-05	10	100	2,628,000	0.132	0.063	100000	0.005	0.002
28	Conv to conv	е	1.0E-04	4.80E-05	10	100	2,628,000	0.132	0.063	100000	0.005	0.002
Emission To	tals							8.118	3.866		1.961	0.934

References (see drawing)

Emission factors listed in AP-42 Table 11.19.2-2 only list PM-10 factors.

Note c of this Talbe states PM emissions can be estimated by multiplying PM-10

Descriptions in bold are new emissions points

- d. AP-42 1/95, Table 11.19.2-2, Tertiary Crushing (moisture content ranges from 0.55% to 2.88%).
- e. AP-42 1/95, Table 11.19.2-2, Conveyor Transfer Point (moisture content ranges from 0.55% to 2.88%).
- f. AP-42 1/95, Table 11.19.2-2, Screening (moisture content ranges from 0.55% to 2.88%).

g. AP-42 p. 12.5-24 Iron and Steel Production (10/86 reformatted 1/95) - pile formation stacker pellet - lump ore								

Appendix A, page 3

Heckett MultiServ Plant 7 LTV Steel-E. Chicago, IN

PROCESS EMISSIONS-Proposed Kish Processing Plant

proposed tph: 350

proposed

hours 2857

proposed	1,000,000											
tons						Uncontrolled PTE				Proposed Controlled PTE		
			PM	PM10 EF	FEED	Feed total PM			PM-10	total	PM	PM-10
ID	DESCRIPTION	ref	lbs/tn	lbs/tn	%	PTE %	Tons/Yr	tons/yr	tons/yr	Tons/Yr	tons/yr	tons/yr
1	Raw Feed	е	1.0E-04	4.80E-05	100	100	3,066,000	0.1545	0.0736	1,000,000	0.050	0.024
2	Feeder to conv	е	1.0E-04	4.80E-05	100	100	3,066,000	0.1545	0.0736	1,000,000	0.050	0.024
3	Feeder to oversize stock	е	1.0E-04	4.80E-05	10	0	-	0	0	100,000	0.005	0.002
4	Conv to conv	е	1.0E-04	4.80E-05	90	0	-	0	0	900,000	0.045	0.022
5	Conv to stockpile	е	1.0E-04	4.80E-05	25	0	-	0	0	250,000	0.013	0.006
6	Conv to conv	Ф	1.0E-04	4.80E-05	65	100	3,066,000	0.1545	0.0736	650,000	0.033	0.016
7	Conv to conv	Ф	1.0E-04	4.80E-05	65	100	3,066,000	0.1545	0.0736	650,000	0.033	0.016
8	Conv to screen	е	1.0E-04	4.80E-05	65	100	3,066,000	0.1545	0.0736	650,000	0.033	0.016
9	Screen	f	1.8E-03	8.40E-04	65	100	3,066,000	2.7042	1.2877	650,000	0.573	0.273
10	Screen to conv	е	1.0E-04	4.80E-05	25	100	3,066,000	0.1545	0.0736	250,000	0.013	0.006
11	Conv to stockpile	е	1.0E-04	4.80E-05	25	100	3,066,000	0.1545	0.0736	250,000	0.013	0.006
12	Screen to conv	е	1.0E-04	4.80E-05	25	0	-	0	0	250,000	0.013	0.006
13	Conv to stockpile	е	1.0E-04	4.80E-05	25	0	-	0	0	250,000	0.013	0.006
14	Screen to oversize stock	е	1.0E-04	4.80E-05	10	0	-	0	0	100,000	0.005	0.002
Emission To	otals			_				3.786	1.803	_	0.891	0.424

References (see drawing)

New Units

Emission factors listed in AP-42 Table 11.19.2-2 only list PM-10 factors.

Note c of this Talbe states PM emissions can be estimated by multiplying PM-10

Descriptions in bold are new emissions points

- d. AP-42 1/95, Table 11.19.2-2, Fines Crushing (moisture content ranges from 0.55% to 2.88%).
- $e. \ \ AP-42\ 1/95, Table\ 11.19.2-2, Conveyor\ Transfer\ Point\ (moisture\ content\ ranges\ from\ 0.55\%\ to\ 2.88\%).$
- f. AP-42 1/95, Table 11.19.2-2, Screening (moisture content ranges from 0.55% to 2.88%).
- g. AP-42 p. 12.5-24 Iron and Steel Production (10/86 reformatted 1/95) pile formation stacker pellet lump ore

PM and PM10 Emissions from Stockpiles Only

Heckett MultiServ Plant 7

1. Emission Factor:

According to AP42, Chapter 13.2.4 - Aggregate Handling and Storage Piles (01/95), the emission factor of PM for aggregate handling process can be estimated using the following equation:

Ef = $.0032 \times (U/5)1.3 \times k$

(M/2)1.4

where: Ef = Emission Factor (lbs/ton)

k = Particle size multipler = 0.74 for PM and 0.35 for PM10

U = Mean wind speed (mph) = 12 mph

M = Moisture content (%) = 0.2 % for uncontrolled

4.1 % for controlled (using wet suppression)

Emission Factor								
PM	PM10							
2.71E-03	1.28E-03							

_				
Proposed Emissions	Tons Piled	PM	PM10	
Proposed Main	2,000,000	2.71	1.28	
Proposed CM13	1,000,000	1.36	0.64	
Proposed Kish	1,000,000	1.36	0.64	
Total Stockpiles	4,000,001	5.42	2.56	

Methodology

PTE (tons/yr) = Max. Throughput (tons/yr) x Controlled Emission Factor (lb/ton) x 1 tons/2000 lbs

Proposed New Plant Emissi	ons Ma	Main Plan		CM13		Proposed Kish		Stockpiles		Total Increase	
Projected Emissions	TSP	PM10	TSP	PM10	TSP	PM10	TSP	PM10	TSP	PM10	
Tons/Yr Emissions @ 4.0N	il										
Ton/Yr Total Production	5.05	2.40	1.961	0.934	0.891	0.424	5.42	2.56	13.32	6.32	